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12 *Attorneys for Defendant  
13 Lincare Holdings Inc.*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 SALLY LENNON, an Individual;

17 Plaintiff,

18 Case No. 2:23-cv-00105-RFB-BNW

19 v.

20 LINDE, PLC., d/b/a LINDE NORTH  
21 AMERICA HOLDINGS, LTD., d/b/a  
22 LINCARE HOLDINGS, INC., d/b/a  
23 PREFERRED HOME CARE, LLC., d/b/a  
24 FOUNDERS HEALTHCARE, LLC.,  
25 LINCARE INC., a Foreign Corporation;  
26 KENNETH CHAPMAN, an individual;  
27 DOES 1 Through 25, inclusive; and ROE  
28 CORPORATIONS 1 Through 25, inclusive,

Defendants.

29 **STIPULATION TO CONTINUE  
30 DEADLINE FOR DEFENDANT  
31 LINCARE HOLDINGS, INC. TO  
32 RESPOND TO PLAINTIFF'S FIRST  
33 AMENDED COMPLAINT**

34 (First Request)

35 Plaintiff Sally Lennon, and Defendant Lincare Holdings Inc.<sup>1</sup> ("Defendant") hereby  
36 stipulate to continue Defendant's deadline to respond to Plaintiff's First Amended Complaint  
37 from July 6, 2023 to July 20, 2023. The reason for the parties' stipulation is as follows:

38 On or about June 15, 2023, Plaintiff filed her First Amended Complaint, adding Defendant  
39 as a new party; counsel for Defendant executed an Acceptance of Service on June 22, 2023. Since  
40 then, Defendant has diligently attempted to gather information necessary to determine the  
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<sup>1</sup> The Complaint's caption incorrectly names all defendants as "dba" forms of each other. The only appropriate "dba"  
43 is Founders Healthcare LLC dba Preferred Homecare.

1 appropriate nature of Lincare Holdings Inc.'s response to the First Amended Complaint.  
2 However, gathering the requisite information has been difficult as a result of relevant individuals  
3 being out of the office on vacation and/or the July 4, 2023 holiday. As such, the parties have  
4 agreed that Defendant's deadline to respond to Plaintiff's First Amended Complaint will be  
5 continued from July 6, 2023 to July 20, 2023 to allow Defendant's counsel the opportunity to  
6 collect necessary information and prepare a response.

7 By entering into this Stipulation, Defendant is not waiving (and is expressly reserving)  
8 any affirmative defenses and rights to assert jurisdictional challenges.

9  
10 DATED this 5th day of July 2023.

**HOLLAND & HART LLP**

*/s/ Dora V. Lane*

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18 Attorneys for Lincare Holdings, Inc.

19 DATED this 5 July 2023.

**KANG & ASSOCIATES, PLLC**

*/s/ Christian Z. Smith*

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28  
29 **ORDER**

30 **IT IS SO ORDERED**

31 **DATED:** 11:33 am, July 06, 2023

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33  
34 **BRENDA WEKSLER**  
35 **UNITED STATES MAGISTRATE JUDGE**